

3. Plaintiffs' reference to the collective "Defendant-Sellers" in some counts of the Complaint and reference to individual defendants in other counts of the Complaint makes the Complaint ambiguous so that Defendant Michael Lynn cannot reasonably frame his answer.

4. Therefore, Defendant Michael Lynn respectfully moves this Honorable Court for an order that requires Plaintiffs to enter a more definite statement.

5. In further support of this motion, Defendants incorporate herein by reference Defendants' Memorandum of Law filed contemporaneous with this motion.

Respectfully submitted,

**LEITNER, WILLIAMS, DOOLEY
& NAPOLITAN, PLLC**

By: s/ Thomas J. Dement II
Thomas J. Dement II
BPRN 17950
J. Paul Brewer
BPRN 25289
Attorneys for Michael C. Lynn
414 Union Street, Suite 1900
Nashville, Tennessee 37219-1782
(615) 255-7722 Phone
(615) 780-2210 Fax
thomas.dement@leitnerfirm.com

CERTIFICATE OF SERVICE

I, the undersigned attorney, do hereby certify that the foregoing document has been served upon all counsel of record for the parties at interest in the case by electronic notification through the Court's CM/ECF System or by placing a true and correct copy of same in the United States mail, postage prepaid, in a properly addressed envelope if any counsel of record is not signed on to CM/ECF to the following address:

John A. Beam, III, Esq.
Kristin J. Fecteau, Esq.
J. Mathew Sharp, Esq.
BEAM & ROGERS, PLLC
709 Taylor Street
P.O. Box 280240
Nashville, Tennessee 37228

This the 14th day of May, 2007.

By: s/ Thomas J. Dement II
Thomas J. Dement II